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14 *The Regents of the University of California*

15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17

18 THE REGENTS OF THE UNIVERSITY OF
19 CALIFORNIA, a California corporation,

20 Plaintiff,

21 v.

22 ROGER JINTEH ARRIGO CHEN, an individual;
23 GENIA TECHNOLOGIES, INC., a Delaware
24 corporation; and DOES 1-25,

Defendants.

Case No. 3:16-cv-07396-EMC

**JOINT STIPULATION AND
[PROPOSED] ORDER TO MODIFY
DEADLINES UNDER CASE
MANAGEMENT ORDER**

JURY TRIAL DEMANDED

Plaintiff Regents of the University of California's ("Plaintiff") and Defendants Roger Jinteh Arrigo Chen ("Chen") and Genia Technologies, Inc. ("Genia," and, together with Chen, "Defendants") (collectively, Plaintiff and Defendants are referred to as the "Parties"), have met-and-conferred and jointly stipulate and agree to move this Honorable Court to modify certain of the deadlines in the Court's Case Management and Pretrial Order for Jury Trial in this case (Dkt. 75). The modifications to the deadlines in the Court's order are identified below, and the Proposed Order granting these modifications is attached hereto. The Trial Date (January 14, 2019) and Final Pretrial Conference date (December 18, 2018) remain unchanged, although the Parties recognize that the requested modification of the Dispositive Motions hearing date may cause the Court to adjust those dates.

Case Event	Current Deadline	Revised Deadline
Trial Date	January 14, 2019	(unchanged)
Final Pretrial Conference	December 18, 2018	(unchanged)
Dispositive Motions (last day to be heard)	October 4, 2018	November 8, 2018 (or alternative date in November 2018 convenient for the Court)
Non-Expert Discovery Cutoff	May 31, 2018	July 13, 2018
Opening Expert Reports	July 12, 2018	August 13, 2018
Rebuttal Expert Reports	August 2, 2018	August 31, 2018
Expert Discovery Cutoff	August 23, 2018	September 24, 2018
ADR	June 15, 2018	(unchanged)
Further Status Conference	April 24, 2018	May 24, 2018 (or alternate date in late May 2018 convenient for the Court)

During the last several months, the Parties have completed a substantial portion of the document and written discovery in this case. However, the Parties believe that further settlement discussions will be beneficial before the Parties expend significant resources on depositions and expert discovery. The Parties have had several productive settlement discussions and have

1 agreed to employ a mediator at this stage to further assist in exploring a settlement. The Parties
2 have also agreed to suspend further discovery activity and deadlines until May 11, 2018
3 (including any deadlines for briefing relating to any motions pending before the Court) to allow
4 time to complete that mediation. Thus, the Parties believe that they would benefit from having
5 additional time to continue exploring settlement. Accordingly, this stipulated modification is not
6 made for purposes of delay, but so that the Parties can further explore a potential resolution of
7 this dispute. The Parties respectfully request that the Court sign the Proposed Order attached
8 hereto.

9 **SO STIPULATED.**

10
11 Dated: April 2, 2018

12 **BAKER BOTTS LLP**

**WILMER CUTLER PICKERING
HALE AND DORR LLP**

13
14 **By:** /s/ Stuart C. Plunkett
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ATTORNEY ATTESTATION

I, Stuart C. Plunkett, am the ECF User whose ID and password are being used to file this Stipulation. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that the concurrence in the filing of the document has been obtained from each of the other signatories.

April 2, 2018

By: /s/ Stuart C. Plunkett
Stuart C. Plunkett

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2018, I electronically filed the above document with the Clerk of the Court using CM/ECF which will send electronic notification of such filing to all registered counsel.

April 2, 2018

By: /s/ Stuart C. Plunkett
Stuart C. Plunkett

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~~PROPOSED~~ ORDER

IT IS SO ORDERED that the foregoing Joint Stipulation is approved.

Pursuant to Federal Rule of Civil Procedure 16, the following modified deadlines are hereby ordered, replacing the previously-ordered dates for these deadlines:

<u>DISPOSITIVE MOTIONS:</u>	Last day to be <i>heard</i> <u>11/8/2018 at 1:30p.m.</u>
<u>NON-EXPERT DISCOVERY CUT-OFF:</u>	<u>7/2/2018</u>
<u>EXPERT REPORTS:</u>	Opening reports by <u>8/16/2018</u> Rebuttal Reports by <u>9/6/2018</u>
<u>EXPERT DISCOVERY CUT-OFF:</u>	<u>9/27/2018</u>
<u>FURTHER STATUS CONFERENCE:</u>	<u>5/24/2018</u>

Dated: 4/3/2018

